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WASH. UT. & TP COMM

September 28, 2012

David Lykken
Pipeline Safety Director
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
Olympia WA, 98504-7250

Dear Mr. Lykken:

Please find attached the Weyerhaeuser Longview response to the 2012 Operations and Maintenance Procedures and Plan Review.

As committed to in our initial response dated June 22, 2012, the attached revised O&M manual section 6 and welding procedure are attached.

Should you have any questions please do not hesitate to contact us directly.

Sincerely,



Tim Haynes
Vice President/Mill Manager
Longview Operations
Weyerhaeuser Company

Attachment A Weyerhaeuser – Ostrander O&M Manual Section 6 Rev D
Attachment B Weyerhaeuser – Ostrander Section G, Welding Procedure

cc Cosentino Consulting Inc.
Pipeline facility files

WEYERHAEUSER LONGVIEW

	Date Issued Sept 15, 2012	Page No. 1 of 1	Reference PHMSA Part 192.605
ISSUED	Revision # 3D	Subject: OPERATIONS AND MAINTENANCE MANUAL	

6 PIPELINE OPERATIONS

6.1 Prevention of Gas Ignition

[§192.751]

- .1 Ignitable amounts of natural gas may exist at any Pipeline Facility where Maintenance is being performed. Steps will be taken to minimize the danger of accidental ignition wherever the presence of Gas constitutes a hazard of fire or explosion.
- .2 For the purposes of Operations & Maintenance activities, an area is considered hazardous when it has accumulated or has the potential to accumulate Gas in concentrations greater than 2.5% gas in air. This amount is 50% of the LEL (lower explosive limit) for natural gas
- .3 The Contracted Operator shall remove all potential ignition sources when Gas is being vented in open air.
- .4 Hot Work Permits are required prior to any welding or flame cutting in most areas. These permits require that the area be checked and found to not contain a combustible mixture of Gas and air. Warning signs should be posted when appropriate.
- .5 Hot work permits are also required in locations where Explosion Proof electrical devices are unsealed.
- .6 When Gas is being vented into the open air, each potential source of ignition will be removed from the area and a fire extinguisher will be provided.
- .7 It is Weyerhaeuser policy that smoking is not allowed in Company facilities, except in designated smoking areas.

6.2 Gas Odorization

.1 Surveillance Requirements

[§192.625(f)]
[WAC 480-93-015]

- a. Weyerhaeuser Odorizes all gas transported in the Weyerhaeuser-Ostrander Pipeline in conformance with §192.625(a).
- b. MONTHLY The Contracted Operator shall confirm the concentration of odorant in air to be 1% or less
- c. The Contracted Operator shall record the results of the concentration test on form F-22 located in Appendix E

WEYERHAEUSER LONGVIEW

	Date Issued Sept 15, 2012	Page No. 1 of 1	Reference PHMSA Part 192.605
ISSUED	Revision # 3D	Subject: OPERATIONS AND MAINTENANCE MANUAL	

- d. Instruments used to conduct odorant sniff tests must be maintained, tested for accuracy, calibrated, and operated in accordance with the manufacturer's recommendations.
- e. Copies of calibration certificates will be retained as outlined in section 1.11.3 of this manual

.2 Notification Requirements

- a. The Comm. Center shall be notified prior to any transfer of odorant.
- b. The Weyerhaeuser Communications Center shall be notified before performing any repair work that will result in a Pipeline alarm.

.3 Maintenance Requirements

- a. Verify that pressure has been removed from lines and equipment before performing repair work. If necessary, blind flanges shall be installed to adequately isolate a section of line or piece of equipment.
- b. Always use new o-rings and gaskets when re-assembling equipment or flanges.

6.3 Pressurizing Facilities

[§192.605(b)(5)]

- .1 The Contracted Operator shall establish and maintain as needed, Procedures for placing Pipeline Facilities into service in accordance with §192.605(b)(5).
- .2 Included in these Procedures will be starting up and shutting down of any part of the Pipeline in a manner designed to assure Operation within the MAOP limits described in Subsection 2.4, plus the build-up allowed for Operation of pressure-limiting and control devices.

6.4 Isolating Facilities

[§192.605(b)(6)]

- .1 The Contracted Operator shall establish and maintain as needed, Procedures for isolating Pipeline Facilities in accordance with §192.605(b)(6) and §192.629.
- .2 Included in these Procedures will be starting up and shutting down of any part of the Pipeline in a manner designed to assure Operation within the MAOP limits described in Subsection 2.4, plus the build-up allowed for Operation of pressure-limiting and control devices.

WEYERHAEUSER LONGVIEW

	Date Issued Sept 15, 2012	Page No. 1 of 1	Reference PHMSA Part 192.605
ISSUED	Revision # 3D	Subject: OPERATIONS AND MAINTENANCE MANUAL	

6.5 Purging Facilities [§192.629]

- .1 The Contracted Operator shall prepare as needed, Procedures outlining the specific requirements for purging Pipeline Facilities to be abandoned or deactivated. Precautions for prevention of ignition shall conform to Subsection 6.1.
- .2 When purging with Gas, the purge will be maintained until 95 percent Gas is measured venting from the Pipeline at the opposite end as determined by appropriate oxygen / combustible gas indicator meters.
- .3 When pipe and equipment are being purged of Gas, pressure shall be reduced to near atmospheric prior to purging.
- .4 Prior to the introduction of air, the facility to be purged must first be purged with nitrogen.
- .5 Public service officials and/or the public should be notified prior to a purge or blowdown in those situations where the normal flow of traffic through the area might be disturbed or where it is anticipated that there will be calls from the public regarding the purge or blowdown.

6.6 Tapping Pipeline's Under Pressure

[§192.627]

- .1 The Contracted Operator shall prepare a Procedure to be followed when tapping Pipeline under pressure.
- .2 This Procedure, specific to the segment being hot tapped, will define the minimum safety equipment and practices required including requirements for:
 - a. Preparation of a hot tap procedure appropriate for the pipe and operating condition.
 - b. Accurate locating of the pipe.
 - c. Verification of material grade of particular joint of pipe.
 - d. Verification of pipe mill data (as required).
 - e. X-ray to verify location of longitudinal seam (as required).
 - f. Ultrasonic verification of wall thickness and integrity.
 - g. Inspection of the tapping coupon for evidence of internal corrosion. See form F-13
- .3 The tapping procedure will be approved by the Weyerhaeuser Pipeline Manager prior to beginning work. form F-24 will serve as a guide for reviewing the tapping

WEYERHAEUSER LONGVIEW

	Date Issued Sept 15, 2012	Page No. 1 of 1	Reference PHMSA Part 192.605
ISSUED	Revision # 3D	Subject: OPERATIONS AND MAINTENANCE MANUAL	

procedure and will be retained in the facility records upon completion of tapping activities.

- .4 A crew Qualified to make hot taps must perform any tap made on the Pipeline under pressure.
- .5 The Personnel making the hot tap shall be familiar with the pressure limitations of the hot tapping equipment being used.
- .6 The Personnel making the hot tap shall be thoroughly trained in the mechanical procedures and safety precautions associated with the use of such equipment.
- .7 During tapping Operations, consideration shall be given to posting personnel at upstream and down stream isolation valves.

6.7 Abandonment of Facilities

[§192.727]

- .1 All Pipeline or segment of Pipeline Abandoned will be handled as per the requirements of PHMSA §192.727.
- .2 Prior to any pipe or equipment being Abandoned, the Contracted Operator shall prepare a written Procedure that at minimum includes requirements for:
 - a. Disconnecting the Abandoned pipe or equipment from all sources of Gas and purged, taking care that no explosive mixture is formed or left in the Abandoned pipe or equipment.
 - b. Injection of an inert substance such as nitrogen or water as appropriate.
 - c. Sealing of the inlet and outlets with steel plates or weld caps.
 - d. Closure and securing (locking device installed) of valves left in place.
 - e. Documentation and Maintenance of abandonment records.
 - f. Reporting to the National Pipeline Mapping System (NPMS) of Abandoned Pipeline crossings of navigable waterways in accordance with §192.727(g)(1).

6.8 Inactive Facilities

- .1 Inactive Facilities are facilities that are taken out of service with the possibility of reactivating the facilities at sometime in the future.

WEYERHAEUSER LONGVIEW

	Date Issued Sept 15, 2012	Page No. 1 of 1	Reference PHMSA Part 192.605
ISSUED	Revision # 3D	Subject: OPERATIONS AND MAINTENANCE MANUAL	

- .2 Procedures for establishing pipe and equipment as Inactive Facilities will be prepared by the Contracted Operator and be approved by the Weyerhaeuser Pipeline Manager.
- .3 The procedures shall comply with the Procedures established by Subsection 6.7.
- .4 During the period of deactivation, all periodic activities shall be performed as prescribed in D.O.T. Part 192, Subparts L and M and as prescribed by this manual.
- .5 In addition, pressure in any Inactive pipe segment or equipment shall be reduced to a point to prevent over pressuring due to thermal changes.

6.9 Conversion of Pipeline Service

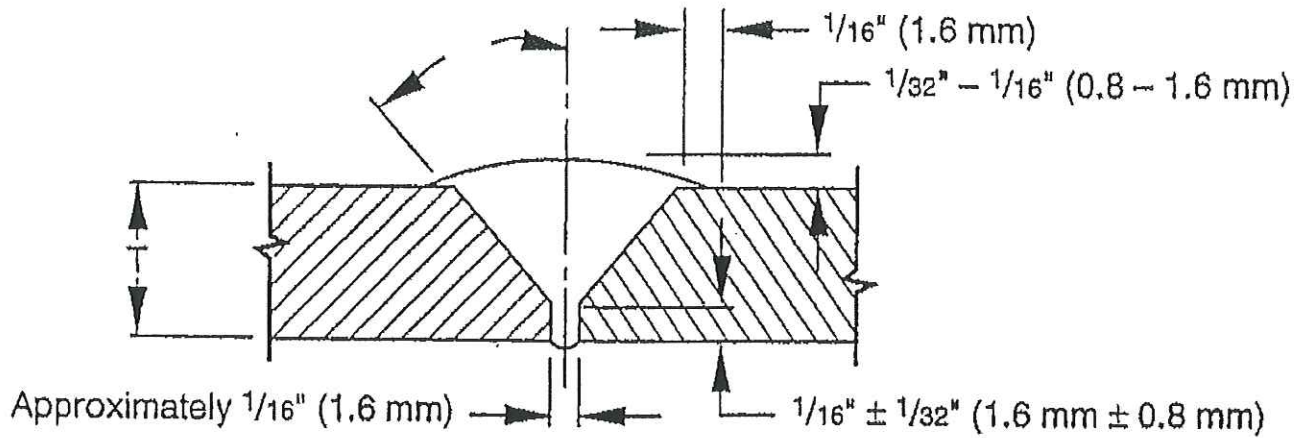
[§192.14]

Weyerhaeuser will test Pipeline that has been Abandoned, or has been in non-jurisdictional service in the same manner as new construction prior to being placed in service under PHMSA 49 CFR §192.

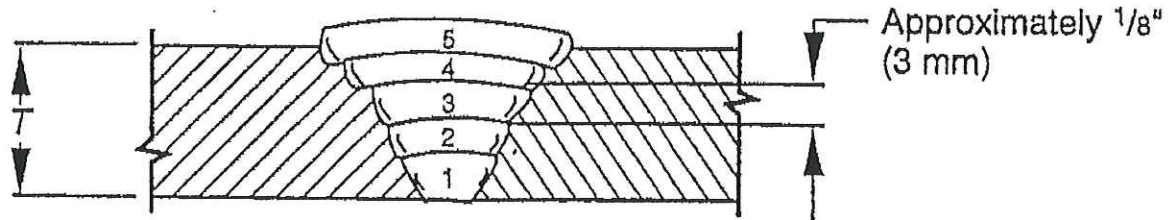
NORTHWEST METAL FAB & PIPE, INC. 4500 SW Advance Road Wilsonville, Oregon 97070 Phone: 503-692-0995 or 503-692-5120 Fax: 503-692-0218	WELDING PROCEDURE SPECIFICATION WEYERHAEUSER-OSTRANDER PIPELINE	WPS- SMAW-6R3A Date 6/4/12 Page 1 of 2
WELDING PROCESS <u>Shielded Metal Arc Welding</u> APPLIED CODE: <u>API STANDARD 1104 20th Edition, October 2005 Errata/ Addendum, July 2004 Errata 2, December 2008 Reaffirmed April 2010</u>		
MATERIALS: Material Group <u>(b)</u> Yield Range (psi) <u>> 42,000 to < 65,000</u> Diameter Group <u>(2)</u> Wall Thickness Group <u>(2)</u>	POSITION: Position <u>6G (Butt) Horizontal (Branch) Fixed</u> Weld Progression <u>Downhill</u>	
JOINTS: Groove Design <u>Single V Butt</u> Type of Backing <u>N/A</u>	PREHEAT: Preheat Temperature (Range) <u>50° Min.</u> Interpass Temperature (Range) <u>Heat of Welding</u> Preheat Method and Control <u>As Required</u>	
FILLER METAL: Group <u>1 & 2</u> Electrode Class <u>6010/8010</u> AWS <u>5.1 & 5.5</u> Spec. No. <u>5.1 & 5.5 AWS</u> Size of Electrode <u>1/8" – 5/32"</u> Shielding Flux <u>N/A</u> Bead Sequence <u>See Sketch</u> Bead Finish <u>See Sketch</u>	POSTWELD HEAT TREATMENT: Temperature (Range) <u>N/A</u> Time at Temperature (Range) <u>N/A</u> Method & Control <u>N/A</u>	
ELECTRICAL OR FLAME CHARACTERISTICS Current (AC or DC) <u>DC</u> Polarity <u>Reverse</u> <div style="text-align: right;"><u>1/8" / 5/32"</u></div> Welding Amps * (Range per Pass) <u>75-140 / 90-180</u> Welding Volts * (Range) <u>20-28 / 24-30</u> Flame Characteristics <u>N/A</u>	GAS Shielding Gas <u>N/A</u> Composition (%) <u>N/A</u> Flow Rate (Range CFH) <u>N/A</u>	
LEGEND N/A Not applicable for this Welding Procedure Specification	TECHNIQUE Travel Speed (Range imp): <u>6-14 IPM</u> Time lapse between root & hot pass: <u>5 Min Max</u> Time lapse between passes: <u>20 Min/ interpass time exceeding 20 minutes would require preheat</u> Min. Number of Welders: <u>1</u> Type of Line-up Clamp: <u>External or Internal</u> Removal of Line-up Clamp: <u>Approximately equal segments spaced approximately equally around the circumference of the joint/ Unduly Stressed 50% External / 100% Internal</u> Initial & Interpass Cleaning: <u>Cleaning and/ or Grinding</u>	
REMARKS	ADDITIONAL REQUIREMENTS Max. Hardness: <u>Heat Affected Zone</u> <u>N/A</u> <u>Weld Metal</u> <u>N/A</u>	

(BACK)

WPS No. SMAW-6R3A



Standard V-Bevel Butt Joint



Sequence of Beads

ELECTRODE SIZE AND NUMBER OF BEADS

BEAD NUMBER	ELECTRODE SIZE AND TYPE	VOLTAGE	AMPERAGE AND POLARITY	SPEED
Root	1/8" / 5/32" E6010	20-28	75-140	6-10 IPM
Hot Pass	1/8" / 5/32" E8010	20-30	75-140	6-10 IPM
Fill	5/32" E8010	24-30	90-180	6-10 IPM
Cover	5/32" E8010	24-30	90-180	6-10 IPM

TESTED: 6/5/2012

WELDER: William S. Morgan

APPROVED: William R Morgan

SIGNATURE:

NORTHWEST METAL FAB & PIPE, INC 4500 SW ADVANCE ROAD WILSONVILLE, OREGON 97070 PHONE: 503-692-0995 FAX: 503-692-0218	WELDING PROCEDURE QUALIFICATION WPS NUMBER: SMAW-6R3A WEYERHAEUSER-OSTRANDER PIPELINE
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PROCEDURE QUALIFICATION RECORD (PQR)

DATE: 06-05-2012		PIPE TYPE AND GRADE: API X-60			
LOCATION: Tualatin Shop		WALL THICKNESS 0.250			
STATE: Oregon		TEST NUMBER: 6512WSM			
WELDER: William S. Morgan		WELD POSITION: 6G	ROLL:	FIXED: X	
WELDING TIME: 2 hours		MARK: WSM			
MEAN TEMPERATURE: 60 degrees		TIME OF DAY: AM			
WEATHER CONDITIONS: Sunny		WIND BREAK USED: Shop			
VOLTAGE: 24-30		AMPERAGE: 80-120			
WELDING MACHINE TYPE: Diesel		WELDING MACHINE SIZE: SA 250			
FILLER METAL 6010/8010		OUTSIDE DIAMETER 12.750			
REINFORCEMENT SIZE: 1/16"		REMARKS: Butt Weld			
TENSILE COUPON TEST	1	2			
COUPON STENCILED	1T	2T			
ORIGINAL SPECIMEN DIMENSIONS	1.014" x 0.252"	1.017" x 0.250"			
ORIGINAL SPECIMEN AREA	0.255"	0.254"			
MAXIMUM LOAD	17,500	17,500			
TENSILE STRENGTH PER SQUARE INCH OF PLATE AREA	78,431	78,741			
FRACTURE LOCATION	Base Metal	Base Metal			
PROCEDURE: X	QUALIFYING TEST: X		QUALIFIED: X		
WELDER:	LINE TEST:		DISQUALIFIED:		
MAXIMUM TENSILE: 78,741	MINIMUM TENSILE: 78,431		AVERAGE TENSILE: 78,586		
REMARKS ON TENSILE-STRENGTH TESTS:					
1. Broke in Parent Metal Meets Specification					
2. Broke in Parent Metal Meets Specification					
3.					
4.					
REMARKS ON BEND TESTS:					
1. Acceptable					
2. Acceptable					
3. Acceptable					
4. Acceptable					

(BACK)


REMARKS ON NICK-BREAK TESTS:	
1. Acceptable	
2. Acceptable	
3.	
4.	
TEST MADE AT: Tualatin Shop	DATE: 06-05-12
TESTED BY: Northwest Metal Fab & Pipe	SUPERVISED BY: William R Morgan

TOUGHNESS TESTS

[illegible]

FILLET-WELD TEST		YES OR NO	
OTHER TESTS			
TYPE OF TEST:			
DEPOSIT ANALYSIS:			
OTHER:			

ANY OTHER INFORMATION OR REMARKS:

WELDER'S NAME: William S. Morgan 5478	CLOCK NO: 102	STAMP NO: WSM
TESTS CONDUCTED BY:		LABORATORY TEST NO: 6512WSM
WE CERTIFY THAT THE STATEMENTS IN THIS RECORD ARE CORRECT AND THAT THE TEST WELDS WERE PREPARED, WELDED AND TESTED IN ACCORDANCE WITH THE REQUIREMENTS OF API STANDARD 1104 20 th Edition, October 2005 Errata/ Addendum, July 2004 Errata 2, December 2008 Reaffirmed April 2010		
MANUFACTURER: Northwest Metal Fab & Pipe		
BY (SIGNATURE): 		DATE: 06-05-2012